

Kami E. Quinn
Gilbert LLP
700 Pennsylvania Avenue, SE
Suite 400
Washington, DC 20003
Tele: 202.772.2200
Fax: 202.772.3333
Email: quinnk@gilbertlegal.com

*Co-Counsel to the Ad Hoc Committee of
Governmental and Other Contingent
Litigation Claimants*

**UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

In re:

PURDUE PHARMA L.P., *et al.*,

Debtors.¹

:
:
:
:
:
:
:
:
:
:

Chapter 11

Case No. 19-23649 (RDD)

(Jointly Administered)

**THIRTY-FOURTH MONTHLY FEE STATEMENT OF GILBERT LLP,
FOR ALLOWANCE OF COMPENSATION FOR SERVICES RENDERED AND
REIMBURSEMENT OF EXPENSES INCURRED AS CO-COUNSEL TO THE AD HOC
COMMITTEE OF GOVERNMENTAL AND OTHER CONTINGENT LITIGATION
CLAIMANTS FOR THE PERIOD JULY 1, 2022 THROUGH JULY 31, 2022**

¹ The Debtors in these cases, along with the last four digits of each Debtor's registration number in the applicable jurisdiction, are as follows: Purdue Pharma L.P. (7484), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies L.P. (1868), Purdue Pharma Manufacturing L.P. (3821), Purdue Pharmaceuticals L.P. (0034), Imbrium Therapeutics L.P. (8810), Adlon Therapeutics L.P. (6745), Greenfield BioVentures L.P. (6150), Seven Seas Hill Corp. (4591), Ophir Green Corp. (4594), Purdue Pharma of Puerto Rico (3925), Avrio Health L.P. (4140), Purdue Pharmaceutical Products L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifescience Inc. (7805), Button Land L.P. (7502), Rhodes Associates L.P. (N/A), Paul Land Inc. (7425), Quidnick Land L.P. (7584), Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF LP (0495), SVC Pharma LP (5717) and SVC Pharma Inc. (4014). The Debtors' corporate headquarters is located at One Stamford Forum, 201 Tresser Boulevard, Stamford, CT 06901.

Name of Applicant:	Gilbert LLP
Authorized to provide professional services to:	Ad Hoc Committee of Governmental and Other Contingent Litigation Claimants
Date of Order Approving Debtors' Payment of Fees and Expenses of Applicant:	December 2, 2019 (Docket #553)
Period for which compensation and reimbursement is sought:	July 1, 2022 through July 31, 2022
Amount of compensation sought as actual, reasonable, and necessary:	\$410,994.80 (80% of \$513,743.50)
Amount of expense reimbursement sought as actual, reasonable and necessary:	\$14,856.05 (100%)
This is a:	Monthly Fee Statement

Pursuant to 11 U.S.C. §§ 105(a), 363(b), and 365 of title 11 of the United States Code (the “**Bankruptcy Code**”), Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”), the *Order Authorizing the Debtors to Assume the Reimbursement Agreement and Pay the Fees and Expenses of the Ad Hoc Committee’s Professionals* entered by this Court on December 2, 2019 [Docket #553] (the “**Reimbursement Order**”), and the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals* [Docket #529] (the “**Procedures Order**”), the law firm of Gilbert LLP (“**Gilbert LLP**”), Co-Counsel to the Ad Hoc Committee of Governmental and Other Contingent Litigation Claimants (the “**AHC**”), hereby submits this thirty-fourth monthly fee statement (the “**Monthly Fee Statement**”) for legal services rendered and reimbursement for expenses incurred for the period commencing July 1, 2022 through July 31, 2022 (the “**Application Period**”).

Itemization of Services Rendered and Expenses Incurred

1. Annexed hereto as **Exhibit A** is a chart of the aggregate number of hours expended and fees incurred by professionals and paraprofessionals during the Application Period by project category. As reflected on Exhibit A, Gilbert LLP incurred \$513,743.50 in fees during the

Application Period. Pursuant to this Monthly Fee Statement, Gilbert LLP seeks reimbursement of 80% of such fees, totaling \$410,994.80.

2. Annexed hereto as **Exhibit B** is a chart of Gilbert LLP's professionals and paraprofessionals, including title, hourly rate, number of hours billed, and total fees of each attorney and paraprofessional who rendered services to the AHC in connection with these chapter 11 proceedings during the Application Period. The blended hourly rate of the attorneys during the Application Period is \$722.52. The blended hourly rate of paraprofessionals during the Application Period is \$321.16.

3. Annexed hereto as **Exhibit C** is the summary of reasonable and necessary expenses incurred during the Application Period. As reflected on Exhibit C, Gilbert LLP incurred \$2,729.55 in expenses during the Application Period. Pursuant to this Monthly Fee Statement, Gilbert LLP seeks reimbursement of 100% of such expenses, totaling \$2,729.55.

4. Annexed hereto as **Exhibit D** is the summary of reasonable and necessary expenses incurred by Gilbert LLP for retained consulting experts, which have not yet been paid. Pursuant to the retention agreements applicable to these consulting experts, Gilbert LLP is not obligated to actually pay the incurred amounts until those expenses have been approved pursuant to the process mandated by the Procedures Order. Pursuant to this Monthly Fee Statement, Gilbert LLP seeks payment for 100% of such expenses, totaling \$12,126.50. Upon receipt, Gilbert LLP will promptly pay the accrued expenses that are approved.

5. Annexed hereto as **Exhibit E** are the time records of Gilbert LLP for the Application Period, organized by project category with a daily log detailing the time spent by each professional and an itemization of expenses.

FILING AND SERVICE

6. This Monthly Fee Statement will be filed and served in accordance with the directives in the Procedures Order.

7. Pursuant to the Procedures Order, any party objecting to the payment of interim compensation and reimbursement of expenses as requested shall, within 14 days of service of the Monthly Fee Statement, serve via email, to the Notice Parties (as defined in the Procedures Order), a written notice setting forth the precise nature of the objection and the amount at issue.

8. If an objection is timely served pursuant to the Procedures Order, the Debtors shall be authorized and directed to pay Gilbert LLP the amount equal to 80% of the fees and 100% of the expenses that are not subject to an objection. Any objection must set forth the precise nature of the objection and the amount at issue. It shall not be sufficient to simply object to all fees and expenses.

[THE REMAINDER OF THIS PAGE IS INTENTIONAL BLANK]

WHEREFORE, Gilbert LLP respectfully requests compensation in the amount of \$410,994.80 (80% of \$513,743.50) and reimbursement of reasonable and necessary expenses incurred in the amount of \$14,856.05 (100%), for a total amount of \$425,850.85 for the Application Period.

Dated: August 31, 2022
Washington, DC

Respectfully submitted,

GILBERT LLP

/s/ Kami E. Quinn

Kami E. Quinn
700 Pennsylvania Avenue, SE
Suite 400
Washington, DC 20003
Tele: 202.772.2200
Fax: 202.772.3333
Email: quinnk@gilbertlegal.com

*Counsel for the Ad Hoc Committee of
Governmental and Other Contingent
Litigation Claimants.*

Exhibit A

Summary of Services by Category

SUMMARY OF SERVICES BY PROJECT CATEGORY

Project Code	Project Category	Hours Billed in Period	Fees for Period
A004	Case Administration	2.2	\$440.00
A009	Meetings / Communications with AHC & Creditors	5.6	\$9,360.00
A015	Non-Working Travel (Billed @ 50%)	32.6	\$12,924.00
A019	Plan of Reorganization / Disclosure Statement	3.3	\$4,950.00
A020	Insurance Adversary Proceeding	697.4	\$486,069.50
		741.1	\$513,743.50

Exhibit B

Summary of Compensation by Professional

Name of Professional	Position / Year Admitted Practice	Hourly Billing Rate	Hours Billed for Period	Total Fees for Period
Scott D. Gilbert	Partner / District of Columbia – 1979 U.S. Court of Appeals for the District of Columbia – 1980 U.S. Court of International Trade – 1984 U.S. Supreme Court – 1987 U.S. District Court for the District of Columbia – 2008 Cherokee Nation – 2017 U.S. Court of Federal Claims – 2019	\$1,800	5.5	\$9,900.00
Kami Quinn	Partner / Commonwealth of Virginia – 2000 District of Columbia – 2006 U.S. Court of Appeals for the Third Circuit – 2009	\$1,250	2.6	\$3,250.00
Richard Leveridge	Partner / District of Columbia – 1981 State of New York – 1997	\$1,450	47.5	\$68,875.00
Richard Shore	Partner / State of New York – 1988 District of Columbia – 1989 U.S. Court of Appeals for the Third Circuit – 2009 U.S. Court of Appeals for the Fourth Circuit – 2014 U.S. Court of Appeals for the Ninth Circuit – 2014 U.S. Court of Appeals for the Fifth Circuit – 2017 Cherokee Nation – 2017	\$1,450	65.0	\$94,250.00
Jason Rubinstein	Partner / State of Maryland – 2006 District of Columbia – 2007 U.S. District Court for the District of Maryland – 2007 U.S. District Court for the District of Columbia – 2011	\$850 \$425 ²	119.1 22.8	\$101,235.00 \$9,690.00
Mike Rush	Of Counsel / State of Delaware – 2007 District of Columbia – 2017	\$700	35.2	\$24,640.00
Adam Farra	Associate / State of Maryland – 2011 District of Columbia – 2015	\$710	4.4	\$3,124.00
Sarah Sraders	Associate / State of New York – 2016 District of Columbia – 2017	\$660 \$330 ²	66.1 9.8	\$43,626.00 \$3,234.00
Alison Gaske	Associate / District of Columbia – 2016	\$610	40.2	\$24,522.00
Ethan Kaminsky	Associate / State of New York – 2018	\$560	5.6	\$3,136.00
Janet Sanchez	Associate / Commonwealth of Virginia - 2020	\$475	42.6	\$20,235.00
Ifenanya Agwu	Associate / District of Columbia – 2022	\$420	68.0	\$28,560.00
December Huddleston	Associate / District of Columbia – 2021	\$420	43.5	\$18,270.00
John Girgenti	Staff Attorney / State of New York – 2002 District of Columbia – 2007	\$365	109.1	\$39,821.50
Blair Hubbard	Director of Analytics – Joined firm in 2021	\$425	11.1	\$4,717.50
Alyssa Bonesteel	eDiscovery & Policy Review Coordinator– Joined firm in 2018	\$375	6.9	\$2,587.50
Sherley Martinez	Paralegal – Joined firm in 2017	\$325	6.8	\$2,210.00

² Non-working travel is billed @ 50% of regular hourly rate.

Name of Professional	Position / Year Admitted Practice	Hourly Billing Rate	Hours Billed for Period	Total Fees for Period
Nick Poz	Paralegal – Joined firm in 2022	\$325	16.0	\$5,200.00
Carmen Turner	Project Assistant – Joined firm in 2021	\$200	13.3	\$2,660.00
	Totals		741.1	\$513,743.50
	Attorney Blended Rate	\$722.52		
	Paraprofessional Blended Rate	\$321.16		

Exhibit C

Summary of Expenses Incurred

SUMMARY OF EXPENSES INCURRED

DESCRIPTION	Total Expenses for Period
Travel – Lodging	\$1,625.86
Travel – Meals	\$205.75
Travel – Parking	\$31.90
Travel – Tolls	\$62.91
Travel – Mileage	\$803.13
Total	\$2,729.55

Exhibit D

Summary of Expenses Incurred and Not Yet Paid

SUMMARY OF EXPENSES INCURRED BUT NOT YET PAID

DESCRIPTION	Total Expenses for Period
Insurance Consulting Expert A	\$12,126.50
Total	\$12,126.50

Exhibit E

Time and Expense Detail

GILBERT LLP

700 Pennsylvania Avenue, SE
Suite 400
Washington, DC 20003
O 202.772.2200
F 202.772.3333
GilbertLegal.com

Ad Hoc Committee
c/o Marshall S. Huebner
Davis Polk & Wardwell LLP
450 Lexington Avenue
New York, NY 10017

August 19, 2022
Invoice Number: 11327736
Client Number: 1599
Tax ID: 52-2283869

FOR PROFESSIONAL SERVICES RENDERED through July 31, 2022

Re: Ad Hoc Committee (Purdue)

Matter Description	Fees	Costs	Total
Purdue Bankruptcy	513,743.50	2,729.55	516,473.05
Total	513,743.50	2,729.55	516,473.05

TOTAL FEES \$ 513,743.50

TOTAL EXPENSES \$ 2,729.55

TOTAL FEES AND EXPENSES \$ 516,473.05

FOR PROFESSIONAL SERVICES RENDERED through July 31, 2022

Purdue Bankruptcy

A004: Case Administration

Name	Date	Services	Hours	Amount
Turner, C.	7/05/22	Review court docket re recently filed pleadings.	1.00	200.00
Turner, C.	7/20/22	Review court docket for recently filed pleadings.	.50	100.00
Turner, C.	7/29/22	Review court docket for recently filed pleadings.	.70	140.00
Project Total:			2.20	\$ 440.00

A009: Meetings / Communications with AHC & Creditors

Name	Date	Services	Hours	Amount
Gilbert, S.	7/05/22	Confer with working group re strategy.	.50	900.00
Gilbert, S.	7/05/22	Confer with AHC re status and strategy.	1.00	1,800.00
Quinn, K.	7/06/22	Participate in call with AHC re update.	.80	1,000.00
Leveridge, R.	7/06/22	Confer with Ad Hoc Committee re status.	.80	1,160.00
Gilbert, S.	7/07/22	Confer with working group re strategy.	.50	900.00
Gilbert, S.	7/12/22	Confer with working group re strategy.	.50	900.00
Gilbert, S.	7/19/22	Confer with working group re strategy.	1.00	1,800.00
Gilbert, S.	7/26/22	Confer with working group re strategy.	.50	900.00
Project Total:			5.60	\$ 9,360.00

A015: Non-Working Travel (Billed @ 50%)

Name	Date	Services	Hours	Amount
Rubinstein, J.	7/12/22	Travel from Washington, DC to Stamford, CT for deposition preparation.	5.50	2,337.50
Rubinstein, J.	7/15/22	Travel from Stamford, CT to Washington, DC after deposition preparation session.	6.00	2,550.00
Rubinstein, J.	7/17/22	Travel from Washington, DC to Stamford, CT for deposition preparation session and deposition of Debtors' Rule 30(b)(6) witness re insurance topics.	5.80	2,465.00
Rubinstein, J.	7/20/22	Travel from Stamford, CT to Washington, DC after deposition.	5.50	2,337.50

Invoice Number: 11327736
August 19, 2022

Name	Date	Services	Hours	Amount
Sraders, S.	7/20/22	Travel (roundtrip) Washington, DC to Stamford, CT to attend deposition.	9.80	3,234.00
Project Total:			32.60	\$ 12,924.00

A019: Plan of Reorganization / Disclosure Statement

Name	Date	Services	Hours	Amount
Quinn, K.	7/13/22	Review Kramer Levin next steps memorandum.	1.50	1,875.00
Quinn, K.	7/21/22	Review case summary from Debtors.	.30	375.00
Gilbert, S.	7/26/22	Attend hearing re status.	.50	900.00
Gilbert, S.	7/26/22	Confer with K. Eckstein re strategy.	1.00	1,800.00
Project Total:			3.30	\$ 4,950.00

A020: Insurance Adversary Proceeding

Name	Date	Services	Hours	Amount
Shore, R.	7/01/22	Draft update to client re new judge, retention of experts, and related issues (0.2); confer with R. Leveridge re same (0.6), communicate with Kramer Levin re same (0.2); review and provide comments re policy stipulation issues (0.2); review data sources issues (0.3).	1.50	2,175.00
Girgenti, J.	7/01/22	Review and identify documents for upcoming Debtors' depositions.	6.50	2,372.50
Rubinstein, J.	7/01/22	Correspond with Debtors' counsel re confidentiality designations of R. O'Connor deposition (0.2); analysis re experts (0.2); review documents identified by review team for depositions (0.7); review letters from insurer defendants (0.3); review memorandum re strategic analysis (0.3); revise Navigators' proposed stipulation (0.9); draft correspondence to insurer counsel (0.9); communicate with co-counsel re same (0.3).	3.80	3,230.00
Sanchez, J.	7/01/22	Review documents in preparation for defensive depositions.	2.00	950.00
Gaske, A.	7/01/22	Review draft policy stipulation comments from R. Shore and J. Rubinstein.	.20	122.00
Leveridge, R.	7/01/22	Communicate with co-counsel re discovery and case administrative matters (0.7); confer with R. Shore re litigation issues (0.6).	1.30	1,885.00
Sraders, S.	7/01/22	Communicate with J. Rubinstein re experts.	.10	66.00

Invoice Number: 11327736
August 19, 2022

Name	Date	Services	Hours	Amount
Hubbard, B.	7/01/22	Review prior policy language analysis.	1.00	425.00
Agwu, I.	7/01/22	Continue reviewing documents production in preparation for upcoming depositions.	6.00	2,520.00
Rubinstein, J.	7/04/22	Review comments to expert retention from UCC counsel (0.4); review UCC comments re draft deposition protocol (0.3).	.70	595.00
Sraders, S.	7/04/22	Research re Issue #34.	4.40	2,904.00
Shore, R.	7/05/22	Confer with S. Sraders re Issue #34.	.60	870.00
Shore, R.	7/05/22	Analysis re deposition protocol (1.1); analyze pending litigation issues (1.0); communicate with J. Rubinstein re retention of consultants and experts (0.4).	2.50	3,625.00
Girgenti, J.	7/05/22	Continue reviewing documents for upcoming depositions.	6.00	2,190.00
Rubinstein, J.	7/05/22	Communicate with co-plaintiffs' counsel re edits to draft deposition protocol (0.3); review proposed edits to same (1.2); draft communication to insurer defendants re same (0.4); correspond with Debtors' counsel re Rule 30(b)(6) deposition (0.5); communicate with defensive document review team re questions (1.3); revise draft policy stipulation re Navigators (0.2); confer with multiple potential experts (0.7); review materials in preparation for Rule 30(b)(6) deposition (0.8); analysis of bankruptcy status (0.4); communicate with A. Bonesteel re transcript review platform (0.2).	6.00	5,100.00
Sanchez, J.	7/05/22	Review documents for defensive depositions.	3.00	1,425.00
Bonesteel, A.	7/05/22	Review and log incoming insurer productions.	1.20	450.00
Gaske, A.	7/05/22	Review comments from J. Rubinstein re draft policy stipulation.	.60	366.00
Leveridge, R.	7/05/22	Communicate with team re discovery, document review, experts and related litigation matters (0.3); review deposition protocols (1.6); communicate with co-counsel re deposition protocol (0.4).	2.30	3,335.00
Leveridge, R.	7/05/22	Communicate with potential experts.	.40	580.00
Sraders, S.	7/05/22	Confer with R. Shore re Issue #34.	.60	396.00
Sraders, S.	7/05/22	Continue research re Issue #34.	1.70	1,122.00
Sraders, S.	7/05/22	Review memorandum from co-counsel re potential impact of Second Circuit ruling.	.10	66.00
Sraders, S.	7/05/22	Correspond with potential expert.	.30	198.00
Turner, C.	7/05/22	Research contact information for potential expert.	.70	140.00
Hubbard, B.	7/05/22	Review and revise data source listing and document updates to same.	2.30	977.50

Invoice Number: 11327736
August 19, 2022

Name	Date	Services	Hours	Amount
Huddleston, D.	7/05/22	Supplemental research re defensive discovery / insurers' scope of discovery.	1.80	756.00
Huddleston, D.	7/05/22	Review and tag documents for deposition preparation.	2.50	1,050.00
Agwu, I.	7/05/22	Continue reviewing documents production in preparation for upcoming depositions.	2.50	1,050.00
Girgenti, J.	7/06/22	Continue reviewing documents in preparation for upcoming depositions.	6.50	2,372.50
Rubinstein, J.	7/06/22	Confer with multiple potential expert witnesses (2.2); communicate with team re draft policy stipulation re Navigators (0.2); communicate with team re advancement of collection of ongoing projects, including various document reviews (0.7); correspond with insurer group re deposition protocol (0.2); begin review of identified documents re Debtors' Rule 30(b)(6) deposition (0.4); review and provide comments on data analysis (0.5); confer with co-counsel and R. Leveridge re expert retention logistics (0.7); continue outlining trial plan (1.0).	5.90	5,015.00
Sanchez, J.	7/06/22	Review discovery in preparation for defensive depositions.	2.80	1,330.00
Martinez, S.	7/06/22	Review and organize identified materials for upcoming Rule 30(b)(6) deposition.	3.60	1,170.00
Leveridge, R.	7/06/22	Review communications with co-counsel re retention of consulting experts (0.3); confer with potential experts (1.3); confer with co-counsel (Kramer Levin) re process for retaining consulting experts (0.7).	2.30	3,335.00
Sraders, S.	7/06/22	Confer with potential expert, R. Leveridge, and J. Rubinstein re potential experts.	.50	330.00
Sraders, S.	7/06/22	Confer with potential expert, R. Leveridge, and J. Rubinstein.	.80	528.00
Sraders, S.	7/06/22	Review status of ongoing document reviews.	.80	528.00
Sraders, S.	7/06/22	Continue research of Issue #34.	1.70	1,122.00
Turner, C.	7/06/22	Organize Rule 30(b)(6) preparation sessions materials.	1.90	380.00
Hubbard, B.	7/06/22	Update documentation re data sources.	1.20	510.00
Agwu, I.	7/06/22	Continue reviewing documents in preparation for upcoming deposition.	3.00	1,260.00
Shore, R.	7/07/22	Confer with team re case strategy.	.90	1,305.00
Shore, R.	7/07/22	Analysis re Issue #27.	2.00	2,900.00
Girgenti, J.	7/07/22	Confer with team re litigation update.	.90	328.50

Invoice Number: 11327736
August 19, 2022

Name	Date	Services	Hours	Amount
Girgenti, J.	7/07/22	Continue reviewing documents for upcoming depositions.	6.50	2,372.50
Rubinstein, J.	7/07/22	Communicate with co-counsel re Debtors' Rule 30(b)(6) deposition preparation (0.6); update litigation task list (0.7); confer with team re litigation status (0.9); communicate with team re potential expert draft retention (0.3); review issues in preparation for meet-and-confer call with insurer counsel re multiple discovery issues (0.9); participate in meet-and-confer re same (1.2); communicate with S. Sraders and A. Gaske re same (0.2); confer with S. Sraders re offensive deposition preparation and expert issues (0.9)	5.70	4,845.00
Sanchez, J.	7/07/22	Confer with team re status of discovery and next steps.	.90	427.50
Martinez, S.	7/07/22	Confer with team re case status and strategy.	.90	292.50
Bonesteel, A.	7/07/22	Confer with team re case status and strategy.	.90	337.50
Bonesteel, A.	7/07/22	Review and log incoming insurer productions.	1.30	487.50
Gaske, A.	7/07/22	Confer with team re litigation strategy and next steps.	.90	549.00
Gaske, A.	7/07/22	Meet-and-confer with plaintiffs and insurer defendants re deposition topics, scheduling order, and various other items.	1.20	732.00
Gaske, A.	7/07/22	Review draft master deposition outline.	.40	244.00
Gaske, A.	7/07/22	Revise draft Rule 30(b)(6) deposition notice pursuant to UCC comments.	.50	305.00
Leveridge, R.	7/07/22	Participate in meet-and-confer with counsel for insurers re discovery.	1.20	1,740.00
Leveridge, R.	7/07/22	Confer with team re litigation status.	.90	1,305.00
Leveridge, R.	7/07/22	Review and revise litigation planning outline.	1.30	1,885.00
Farra, A.	7/07/22	Confer with team re litigation update.	.90	639.00
Sraders, S.	7/07/22	Confer with team re recent developments and strategy for next steps.	.90	594.00
Sraders, S.	7/07/22	Meet-and-confer with insurers re depositions and schedule.	1.20	792.00
Sraders, S.	7/07/22	Review draft engagement letter for potential expert.	.50	330.00
Sraders, S.	7/07/22	Confer with J. Rubinstein re experts and preparing for offensive deposition.	.90	594.00
Kaminsky, E.	7/07/22	Confer with team re litigation status and strategy.	.90	504.00
Kaminsky, E.	7/07/22	Research evidence law re admissability.	1.10	616.00
Turner, C.	7/07/22	Confer with team re litigation strategy and case updates.	.90	180.00

Invoice Number: 11327736
August 19, 2022

Name	Date	Services	Hours	Amount
Turner, C.	7/07/22	Finalize materials for Rule 30(b)(6) deposition preparation sessions.	2.60	520.00
Huddleston, D.	7/07/22	Draft tracking chart for certain policy provisions.	2.10	882.00
Huddleston, D.	7/07/22	Confer with team re case status.	.90	378.00
Agwu, I.	7/07/22	Confer with team re case status.	.90	378.00
Agwu, I.	7/07/22	Review documents in preparation for upcoming deposition.	3.10	1,302.00
Poz, N.	7/07/22	Review draft retention agreement with potential expert.	.10	32.50
Poz, N.	7/07/22	Confer with team re case status and next steps.	.90	292.50
Girgenti, J.	7/08/22	Continue reviewing documents for upcoming depositions.	6.50	2,372.50
Rubinstein, J.	7/08/22	Communicate with A. Gaske re follow up to insurers re policy stipulations and insurer responses (0.4); review revisions to Rule 30(b)(6) deposition notice to insurers (0.3); analysis re expert retention procedures (0.3); review analysis re terms of at-issue policies (0.3); review correspondence re confidentiality designation of R. O'Connor deposition (0.2); review collections of identified documents in preparation for Debtors' Rule 30(b)(6) deposition (3.9).	5.40	4,590.00
Gaske, A.	7/08/22	Revise draft of individual insurer Rule 30(b)(6) notices.	2.00	1,220.00
Gaske, A.	7/08/22	Communicate with each insurer re policy stipulations.	1.30	793.00
Leveridge, R.	7/08/22	Communicate with co-counsel re deposition preparation (0.6); communications with team re offensive discovery (0.3).	.90	1,305.00
Sraders, S.	7/08/22	Review chart of certain policy language.	.40	264.00
Kaminsky, E.	7/08/22	Draft memorandum re evidentiary law research.	2.50	1,400.00
Huddleston, D.	7/08/22	Revise policy language chart to include insurance companies' names.	.60	252.00
Agwu, I.	7/08/22	Review documents in preparation for upcoming deposition.	3.00	1,260.00
Agwu, I.	7/08/22	Continue researching evidentiary issues.	3.00	1,260.00
Poz, N.	7/08/22	Revise Rule 30(b)(6) notices for each individual insurer.	1.40	455.00
Rubinstein, J.	7/09/22	Continue review of documents identified re Debtors' Rule 30(b)(6) deposition.	2.50	2,125.00

Invoice Number: 11327736
August 19, 2022

Name	Date	Services	Hours	Amount
Rubinstein, J.	7/10/22	Continue review of identified documents re Debtors' Rule 30(b)(6) deposition (2.1); communicate with A. Gaske re finalizing drafts of Rule 30(b)(6) notices to insurer defendants and following up with insurer defendants re Rule 30(b)(1) deponents (0.4); revise trial plan (0.5)	3.00	2,550.00
Leveridge, R.	7/10/22	Communicate with team re case management issues.	.20	290.00
Shore, R.	7/11/22	Confer with R. Leveridge and J. Rubinstein re discovery and litigation strategy (2.1); analysis re expert and proof issues (0.7); review Navigators policy stipulation and provide comments to same (0.4); review correspondence from potential expert (0.4); communicate with expert re potential expert work (0.4); communicate with M. Rush re coverage issue (0.8); review J. Rubinstein analysis re Rule 30(b)(6) deposition preparation (1.2).	6.00	8,700.00
Shore, R.	7/11/22	Confer with A. Gaske re draft policy stipulation template.	.20	290.00
Girgenti, J.	7/11/22	Continue reviewing documents for upcoming depositions.	7.00	2,555.00
Rubinstein, J.	7/11/22	Review materials in preparation for Debtors' Rule 30(b)(6) deposition (1.7); confer with R. Shore and R. Leveridge re case strategy (2.1); confer with R. Leveridge re expert projects (0.2); review insurer communications re policy stipulations and R. Shore edits to draft Navigators stipulation (0.4); confer with M. Rush and S. Sraders re status of document review projects (1.1); communicate with team re offensive discovery next steps (0.3); revise draft correspondence re Rule 30(b)(1) depositions of insurer witnesses (0.1).	5.90	5,015.00
Sanchez, J.	7/11/22	Review document collection in preparation for defensive depositions.	2.40	1,140.00
Rush, M.	7/11/22	Confer with J. Rubinstein and S. Sraders re discovery status and next steps.	1.10	770.00
Rush, M.	7/11/22	Review status of document review for depositions.	1.80	1,260.00
Rush, M.	7/11/22	Review draft deposition notices.	.50	350.00
Rush, M.	7/11/22	Communicate with insurers re deposition scheduling.	.30	210.00
Rush, M.	7/11/22	Review productions made in response to subpoenas.	1.30	910.00
Rush, M.	7/11/22	Review Insurer #15 privilege and redaction logs.	.40	280.00
Rush, M.	7/11/22	Review Insurers #18, #19 and #20 supplemental productions.	.50	350.00

Invoice Number: 11327736
August 19, 2022

Name	Date	Services	Hours	Amount
Bonesteel, A.	7/11/22	Review and log incoming insurer productions.	.50	187.50
Gaske, A.	7/11/22	Confer with R. Shore re policy stipulation template.	.20	122.00
Gaske, A.	7/11/22	Review Rule 30(b)(6) deposition topics served on Debtors (0.3); draft summary of July 7 meet-and-confer with defendant insurers (0.9).	1.20	732.00
Gaske, A.	7/11/22	Communicate with co-plaintiffs re draft Rule 30(b)(6) deposition notices.	.40	244.00
Gaske, A.	7/11/22	Communicate with team re status of various production reviews and tasks.	.50	305.00
Gaske, A.	7/11/22	Communicate with certain insurers re proposed policy pages.	.20	122.00
Gaske, A.	7/11/22	Review R. Shore edits to draft policy stipulation for Navigators.	.10	61.00
Leveridge, R.	7/11/22	Confer with R. Shore and J. Rubinstein re litigation status.	2.10	3,045.00
Leveridge, R.	7/11/22	Communicate with P. Breene re discovery from Debtors' witnesses.	.60	870.00
Leveridge, R.	7/11/22	Communicate with team re offensive and third-party discovery.	.60	870.00
Leveridge, R.	7/11/22	Communicate with J. Rubinstein, R. Shore, and S. Sraders re expert issues (0.3); review communications with co-counsel re same (0.8).	1.10	1,595.00
Sraders, S.	7/11/22	Confer with J. Rubinstein and M. Rush re status of ongoing document reviews.	.60	396.00
Sraders, S.	7/11/22	Review summary of meet-and-confer with insurers.	.40	264.00
Sraders, S.	7/11/22	Communicate with R. Leveridge re experts.	.30	198.00
Hubbard, B.	7/11/22	Review correspondence from potential expert.	.80	340.00
Huddleston, D.	7/11/22	Communicate with M. Rush re update of document review for depositions.	.10	42.00
Poz, N.	7/11/22	Prepare documents for deposition preparation session.	.50	162.50
Poz, N.	7/11/22	Review and categorize discovery materials re Rule 30(b)(6) deposition of Debtors' plaintiffs.	.20	65.00
Shore, R.	7/12/22	Confer with J. Rubinstein and R. Leveridge re expert retentions.	.70	1,015.00
Shore, R.	7/12/22	Analysis re Issue #34 (0.8); confer with S. Sraders re same (0.7).	1.50	2,175.00
Girgenti, J.	7/12/22	Review documents for upcoming Debtors' depositions.	7.10	2,591.50

Invoice Number: 11327736
August 19, 2022

Name	Date	Services	Hours	Amount
Rubinstein, J.	7/12/22	Review updated materials for deposition preparation sessions (1.1); confer with R. Leveridge re multiple litigation projects (0.3); correspond with M. Rush re Rule 30(b)(1) related emails to insurers (0.1); confer with co-plaintiffs re Debtors' Rule 30(b)(6) deposition (0.7); confer with R. Shore and R. Leveridge re expert retentions (0.7); correspond with co-counsel re same (0.2).	3.10	2,635.00
Sanchez, J.	7/12/22	Review documents in preparation for defensive depositions.	4.90	2,327.50
Rush, M.	7/12/22	Review third-party productions.	.80	560.00
Rush, M.	7/12/22	Communicate with insurers re depositions.	1.10	770.00
Rush, M.	7/12/22	Review recent opioid decision.	3.60	2,520.00
Rush, M.	7/12/22	Confer with co-counsel re deposition preparation.	.70	490.00
Gaske, A.	7/12/22	Communicate with certain insurers re policy stipulation discussion.	.20	122.00
Gaske, A.	7/12/22	Revise draft policy stipulation for Navigators pursuant to R. Shore's edits.	1.30	793.00
Gaske, A.	7/12/22	Communicate with insurers re Rule 30(b)(1) deponents.	.90	549.00
Leveridge, R.	7/12/22	Confer with R. Shore and J. Rubinstein re expert retention issues (0.7); confer with S. Sraders re same (0.5); analysis re expert issues (1.2).	2.40	3,480.00
Leveridge, R.	7/12/22	Confer with co-counsel re Debtors' Rule 30(b)(6) deposition (0.7); review material re same (0.9).	1.60	2,320.00
Sraders, S.	7/12/22	Confer with R. Leveridge re potential experts.	.50	330.00
Sraders, S.	7/12/22	Draft expert report tracking chart.	2.20	1,452.00
Sraders, S.	7/12/22	Confer with R. Shore re Issue #34.	.70	462.00
Sraders, S.	7/12/22	Correspond with insurers re depositions.	.80	528.00
Hubbard, B.	7/12/22	Confer with N. Poz re insurance policy documentation.	.50	212.50
Hubbard, B.	7/12/22	Draft correspondence re status of expert retention (0.8); review R. Shore notes re potential work by potential expert (0.4).	1.20	510.00
Poz, N.	7/12/22	Confer with B. Hubbard re policies review project.	.50	162.50
Shore, R.	7/13/22	Participate in Rule 30(b)(6) deposition preparation (partial) (4.6); analysis re Issue #27 (0.8); confer with potential expert and R. Leveridge (0.9).	6.30	9,135.00
Girgenti, J.	7/13/22	Continue analyzing documents for upcoming depositions.	7.10	2,591.50

Invoice Number: 11327736
August 19, 2022

Name	Date	Services	Hours	Amount
Rubinstein, J.	7/13/22	Participate in Debtors' Rule 30(b)(6) deposition preparation session (8.5); review materials for subsequent preparation session (2.1); provide comments on potential expert analysis (0.2); provide comments on draft insurer Rule 30(b)(6) deposition notices (0.3).	11.10	9,435.00
Rush, M.	7/13/22	Review analysis re allged insurer defense.	.30	210.00
Gaske, A.	7/13/22	Revise draft policy stipulation.	1.00	610.00
Gaske, A.	7/13/22	Revise insurer-specific draft Rule 30(b)(6) notice.	1.40	854.00
Leveridge, R.	7/13/22	Confer with potential expert and R. Shore re retention.	.90	1,305.00
Leveridge, R.	7/13/22	Communicate with co-counsel re discovery issues.	.70	1,015.00
Sraders, S.	7/13/22	Research re potential experts.	2.10	1,386.00
Sraders, S.	7/13/22	Review documents in preparation for insurer Rule 30(b)(6) depositions.	1.20	792.00
Hubbard, B.	7/13/22	Review questions posed by potential expert.	.70	297.50
Shore, R.	7/14/22	Review deposition materials (3.0); confer with potential expert (1.0).	4.00	5,800.00
Girgenti, J.	7/14/22	Review and identify documents for upcoming depositions.	6.50	2,372.50
Rubinstein, J.	7/14/22	Review materials and issues in preparation for Debtors' Rule 30(b)(6) deposition (2.3); review insurer correspondence re discovery (0.2); analysis re expert retentions (0.5).	3.00	2,550.00
Rush, M.	7/14/22	Review discovery responses.	.30	210.00
Leveridge, R.	7/14/22	Confer with co-counsel re Rule 30(b)(6) deposition preparation.	1.50	2,175.00
Leveridge, R.	7/14/22	Communicate with UCC counsel re claims analysis (0.1); confer with potential consulting expert (1.0); confer with co-counsel re expert issues (0.2).	1.30	1,885.00
Hubbard, B.	7/14/22	Confer with potential expert.	1.00	425.00
Agwu, I.	7/14/22	Review documents in preparation for upcoming depositions.	3.00	1,260.00
Shore, R.	7/15/22	Review and revise materials for upcoming deposition.	1.50	2,175.00
Girgenti, J.	7/15/22	Continue analyzing documents for upcoming depositions.	6.50	2,372.50
Rubinstein, J.	7/15/22	Analyze materials and issues for Debtors' Rule 30(b)(6) witness preparation session (1.5); participate in same (5.8); confer with Debtors' counsel following preparation session (0.8).	8.10	6,885.00
Rush, M.	7/15/22	Continue reviewing materials in preparation for insurer depositions.	5.20	3,640.00

Invoice Number: 11327736
August 19, 2022

Name	Date	Services	Hours	Amount
Leveridge, R.	7/15/22	Communicate with team re claim analysis.	.40	580.00
Leveridge, R.	7/15/22	Communicate with R. Ringer re retention of consulting experts.	.50	725.00
Leveridge, R.	7/15/22	Communicate with co-counsel re upcoming Rule 30(b)(6) deposition (0.4); review materials re same (0.9).	1.30	1,885.00
Huddleston, D.	7/15/22	Review and tag documents for upcoming deposition.	1.50	630.00
Agwu, I.	7/15/22	Review documents in preparation for upcoming deposition.	3.00	1,260.00
Poz, N.	7/15/22	Communicate with B. Hubbard re policy review project.	.30	97.50
Shore, R.	7/17/22	Review and provide comments on Rule 30(b)(6) materials (4.2); confer with co-plaintiffs' counsel re same (1.0).	5.20	7,540.00
Rubinstein, J.	7/17/22	Review materials re Debtors' Rule 30(b)(6) deposition and provide comments to co-counsel (1.3); confer with co-counsel re same (1.0).	2.30	1,955.00
Leveridge, R.	7/17/22	Confer with co-counsel re Rule 30(b)(6) strategy (1.0); review materials re same (0.9).	1.90	2,755.00
Shore, R.	7/18/22	Review and revise Rule 30(b)(6) materials (2.6); confer with co-plaintiffs' counsel re same (1.4); participate in deposition preparation (3.3); confer with National Union and A. Gaske re policy stipulation (0.4).	7.70	11,165.00
Girgenti, J.	7/18/22	Review and identify documents for upcoming depositions.	6.50	2,372.50
Rubinstein, J.	7/18/22	Confer with Debtors' re Rule 30(b)(6) witness in preparation for deposition (7.5); confer with co-counsel re same and other tasks relevant to deposition preparation (5.2); confer with S. Sraders re same (0.3).	13.00	11,050.00
Sanchez, J.	7/18/22	Review documents in preparation for defensive depositions.	4.30	2,042.50
Rush, M.	7/18/22	Review documents in preparation for insurer depositions (0.4); draft outlines for same (0.5).	.90	630.00
Gaske, A.	7/18/22	Confer with counsel for National Union and R. Shore re policy stipulation.	.40	244.00
Gaske, A.	7/18/22	Confer with counsel for Gulf and St. Paul Fire re policy stipulations.	.40	244.00
Gaske, A.	7/18/22	Draft notes after calls with Gulf, National Union and St. Paul Fire re policy stipulation.	1.00	610.00
Gaske, A.	7/18/22	Finalize Rule 30(b)(6) notices and send to insurer defendants.	2.00	1,220.00

Invoice Number: 11327736
August 19, 2022

Name	Date	Services	Hours	Amount
Gaske, A.	7/18/22	Communicate with N. Poz re drafting insurer-specific policy stipulations.	.20	122.00
Gaske, A.	7/18/22	Review documents re Rule 30(b)(6) deposition preparation.	.40	244.00
Leveridge, R.	7/18/22	Communicate with co-counsel re preparation for Debtors' Rule 30(b)(6) deposition (1.0); review communications from opposing counsel re same (0.9).	1.90	2,755.00
Leveridge, R.	7/18/22	Communicate with team re experts (0.3); confer with S. Sraders re tracking spreadsheet re experts (0.6).	.90	1,305.00
Sraders, S.	7/18/22	Confer with R. Leveridge re experts.	.60	396.00
Sraders, S.	7/18/22	Draft memorandum re Issue #34.	.70	462.00
Sraders, S.	7/18/22	Research re potential experts.	1.20	792.00
Sraders, S.	7/18/22	Confer with J. Rubinstein re upcoming Rule 30(b)(6) deposition.	.30	198.00
Poz, N.	7/18/22	Revise Rule 30(b)(6) deposition notices.	.90	292.50
Shore, R.	7/19/22	Analyze sources of information re Issue #27.	.80	1,160.00
Shore, R.	7/19/22	Review and revise materials for Rule 30(b)(6) deposition (0.9); confer with J. Rubinstein re same (0.6); communicate with co-counsel re same (0.5).	2.00	2,900.00
Girgenti, J.	7/19/22	Review documents for upcoming depositions (4.1); review policies at issue for specific policy language re Rule 30(b)(6) deposition preparation (1.2).	5.30	1,934.50
Rubinstein, J.	7/19/22	Review documents in preparation for Debtors' Rule 30(b)(6) deposition (2.0); communicate with co-counsel re same (0.5); review update from A. Gaske re meet-and-confer discussions with multiple insurers re potential policy stipulations (0.2); analysis re proposed next steps by S. Sraders re expert retentions (0.3); analysis re Issue #27 (1.5); analysis of policy language relevant to Issue #2 (0.5); confer with R. Shore re strategy (0.6).	5.60	4,760.00
Sanchez, J.	7/19/22	Review insurance policy language in preparation for depositions.	2.70	1,282.50
Bonesteel, A.	7/19/22	Communicate with team re deposition transcripts.	.60	225.00
Gaske, A.	7/19/22	Confer with N. Poz re policy stipulations and exhibits.	.20	122.00
Gaske, A.	7/19/22	Revise policy comparison spreadsheet using certain policy produced by Insurer #24.	1.60	976.00
Leveridge, R.	7/19/22	Review communications among co-counsel re preparation for Debtors' Rule 30(b)(6) deposition.	.60	870.00
Leveridge, R.	7/19/22	Review claims analysis.	.90	1,305.00

Invoice Number: 11327736
August 19, 2022

Name	Date	Services	Hours	Amount
Sraders, S.	7/19/22	Analysis of policies for relevant language re Issue #2.	4.10	2,706.00
Sraders, S.	7/19/22	Review outline for upcoming Rule 30(b)(6) deposition.	.30	198.00
Sraders, S.	7/19/22	Revise expert tracking chart.	.30	198.00
Sraders, S.	7/19/22	Confer with J. Rubinstein re experts.	.60	396.00
Sraders, S.	7/19/22	Review outline for upcoming deposition of L. Pinho.	.60	396.00
Huddleston, D.	7/19/22	Review insurance policies re Issue #2.	1.00	420.00
Agwu, I.	7/19/22	Review documents in preparation for upcoming deposition.	3.00	1,260.00
Poz, N.	7/19/22	Draft proposed policy stipulation with XL Insurance America, Inc.	1.10	357.50
Poz, N.	7/19/22	Confer with A. Gaske re policy stipulation project.	.30	97.50
Poz, N.	7/19/22	Organize exhibits in support of stipulation with XL Insurance America, Inc.	1.70	552.50
Shore, R.	7/20/22	Analyze deposition and discovery issues.	1.50	2,175.00
Girgenti, J.	7/20/22	Continue reviewing documents for upcoming depositions.	7.60	2,774.00
Rubinstein, J.	7/20/22	Confer with co-counsel in preparation for deposition (3.7); participation in Debtors' Rule 30(b)(6) deposition (8.8).	12.50	10,625.00
Sanchez, J.	7/20/22	Review documents in preparation for defensive depositions.	3.30	1,567.50
Rush, M.	7/20/22	Attend Debtors' Rule 30(b)(6) deposition (virtually).	8.80	6,160.00
Gaske, A.	7/20/22	Communicate with Debtors' counsel re policy stipulations.	.40	244.00
Gaske, A.	7/20/22	Review documents produced by Insurers #23 and #33 re Rule 30(b)(6) deposition preparation.	1.00	610.00
Leveridge, R.	7/20/22	Review communications re Rule 30(b)(6) deposition.	.40	580.00
Leveridge, R.	7/20/22	Communicate with potential consulting expert re protective order requirements.	.40	580.00
Leveridge, R.	7/20/22	Review communication from S. Sraders re experts.	.30	435.00
Sraders, S.	7/20/22	Attend deposition of Debtors' Rule 30(b)(6) witness.	8.80	5,808.00
Sraders, S.	7/20/22	Revise draft chart re experts.	.50	330.00
Huddleston, D.	7/20/22	Continue document review for defensive depositions.	2.60	1,092.00
Agwu, I.	7/20/22	Review documents in preparation for upcoming deposition.	3.00	1,260.00

Invoice Number: 11327736
August 19, 2022

Name	Date	Services	Hours	Amount
Shore, R.	7/21/22	Confer with R. Leveridge and J. Rubinstein re status, strategy, and next steps (1.2); confer with team re status and strategy (0.6); analyze various litigation issues, including expert issues (0.7).	2.50	3,625.00
Girgenti, J.	7/21/22	Confer with team re case update.	.60	219.00
Girgenti, J.	7/21/22	Analyze documents for upcoming depositions.	7.00	2,555.00
Rubinstein, J.	7/21/22	Confer with R. Shore and R. Leveridge re projects and strategy (1.2); analysis re Marsh depositions (0.5); confer with team re litigation status (0.6); coordinate multiple document review projects re upcoming deposition preparation (0.7); communications with co-counsel re deposition scheduling (0.1).	3.10	2,635.00
Sanchez, J.	7/21/22	Review collection of documents in preparation for defensive depositions.	3.70	1,757.50
Sanchez, J.	7/21/22	Confer with team re status of depositions and outstanding tasks.	.60	285.00
Rush, M.	7/21/22	Communicate with L. Szymanski re document review.	1.30	910.00
Rush, M.	7/21/22	Confer with team re case status and strategy.	.60	420.00
Martinez, S.	7/21/22	Confer with team re case status and strategy.	.60	195.00
Bonesteel, A.	7/21/22	Confer with team re case status and strategy.	.60	225.00
Gaske, A.	7/21/22	Confer with team re litigation strategy and next steps.	.60	366.00
Leveridge, R.	7/21/22	Confer with R. Shore and J. Rubinstein re strategic decisions for litigation.	1.20	1,740.00
Leveridge, R.	7/21/22	Communicate with expert re retention issues (0.4); confer with B. Hubbard re data (1.0).	1.40	2,030.00
Leveridge, R.	7/21/22	Confer with team re case status and strategy.	.60	870.00
Farra, A.	7/21/22	Analyze deposition transcript of J. Lowne.	.50	355.00
Farra, A.	7/21/22	Confer with team re litigation update.	.60	426.00
Farra, A.	7/21/22	Begin drafting contention interrogatory responses.	.90	639.00
Sraders, S.	7/21/22	Analysis re claims data.	.60	396.00
Sraders, S.	7/21/22	Confer with team re progress on various matters and strategy for next steps.	.60	396.00
Sraders, S.	7/21/22	Draft memorandum re Issue #34.	4.20	2,772.00
Kaminsky, E.	7/21/22	Confer with team re case strategy.	.60	336.00
Turner, C.	7/21/22	Confer with team re litigation strategy and case updates.	.60	120.00
Turner, C.	7/21/22	Review and organize Debtors' Rule 30(b)(6) deposition materials.	.20	40.00

Invoice Number: 11327736
August 19, 2022

Name	Date	Services	Hours	Amount
Hubbard, B.	7/21/22	Confer with team re status and strategy (0.6); confer with R. Leveridge re data source review (1.0).	1.60	680.00
Huddleston, D.	7/21/22	Continue reviewing documents for defensive depositions.	5.30	2,226.00
Huddleston, D.	7/21/22	Confer with team re case update.	.60	252.00
Agwu, I.	7/21/22	Review documents in preparation for upcoming deposition.	4.90	2,058.00
Agwu, I.	7/21/22	Confer with team re litigation update.	.60	252.00
Poz, N.	7/21/22	Confer with team re case status and next steps.	.60	195.00
Girgenti, J.	7/22/22	Continue analyzing documents in preparation for upcoming depositions..	3.50	1,277.50
Rubinstein, J.	7/22/22	Analysis of expert retention process (0.5); confer with A. Farra re information relevant to responses to contention interrogatories (0.8); review certain Navigators documents (0.2).	1.50	1,275.00
Sanchez, J.	7/22/22	Review collection of documents in preparation for defensive depositions.	4.80	2,280.00
Rush, M.	7/22/22	Review Navigators supplemental production.	1.60	1,120.00
Gaske, A.	7/22/22	Analyze transcript review in database.	.40	244.00
Gaske, A.	7/22/22	Review Debtors' Rule 30(b)(6) deposition transcript.	1.30	793.00
Gaske, A.	7/22/22	Review documents re preparation for Rule 30(b)(1) depositions.	3.40	2,074.00
Leveridge, R.	7/22/22	Analysis re supplemental discovery produced by insurer.	.60	870.00
Leveridge, R.	7/22/22	Communicate with expert re retention.	.40	580.00
Leveridge, R.	7/22/22	Review insurer proposal for schedule adjustment.	.40	580.00
Farra, A.	7/22/22	Continue drafting contention interrogatory responses.	.20	142.00
Farra, A.	7/22/22	Confer with J. Rubinstein re contention interrogatory responses.	.80	568.00
Sraders, S.	7/22/22	Draft memorandum re Issue #34.	.70	462.00
Sraders, S.	7/22/22	Communicate with A. Gaske re document review in database.	.10	66.00
Turner, C.	7/22/22	Continue to review and organize Rule 30(b)(6) deposition materials.	1.00	200.00
Huddleston, D.	7/22/22	Continue review of documents for defensive depositions.	2.00	840.00

Invoice Number: 11327736
August 19, 2022

Name	Date	Services	Hours	Amount
Shore, R.	7/25/22	Confer with R. Leveridge and J. Rubinstein re status, strategy, and next steps (0.8); review and revise Navigators stipulation (0.5); review edits to consultant retention agreement (0.4); review revised case management order (0.4).	2.00	2,900.00
Girgenti, J.	7/25/22	Continue reviewing documents for upcoming depositions.	2.50	912.50
Rubinstein, J.	7/25/22	Confer with R. Leveridge and R. Shore re case strategy (0.8); communicate with team re draft Navigators stipulation (0.5); analysis re status of additional policy stipulation discussions with other insurers (0.4); communicate with co-counsel re insurer defendants' proposed edits to case scheduling order (1.0); confer with potential expert and S. Sraders (0.4); confer with Debtors' counsel and M. Rush re various document reviews in preparation for upcoming depositions (0.6).	3.70	3,145.00
Sanchez, J.	7/25/22	Continue reviewing documents in preparation for defensive depositions.	3.70	1,757.50
Rush, M.	7/25/22	Confer with L. Szymanski and J. Rubinstein re upcoming depositions and preparation for the same.	.60	420.00
Martinez, S.	7/25/22	Review Judge Lane's chamber rules re relevant rules of procedure.	.50	162.50
Gaske, A.	7/25/22	Revise draft policy stipulation for Navigators pursuant to R. Shore edits.	1.20	732.00
Leveridge, R.	7/25/22	Confer with R. Shore and J. Rubinstein re status of discovery and other pending matters (0.8); review communications with co-counsel re same (0.4).	1.20	1,740.00
Sraders, S.	7/25/22	Confer with potential expert and J. Rubinstein re retention.	.40	264.00
Sraders, S.	7/25/22	Draft memorandum re Issue #34.	4.40	2,904.00
Turner, C.	7/25/22	Review Navigators and Marsh correspondence.	.30	60.00
Huddleston, D.	7/25/22	Continue reviewing documents for defensive depositions.	3.60	1,512.00
Agwu, I.	7/25/22	Continue review of documents in preparation for upcoming deposition.	6.00	2,520.00
Shore, R.	7/26/22	Attend status hearing in bankruptcy court (0.5); confer with S. Sraders re Issue #27 (0.4); analysis re healthcare data (0.8); confer with potential expert re same (0.6); analysis re litigation strategy (0.8); communicate with J. Rubinstein re same (0.4).	3.50	5,075.00
Girgenti, J.	7/26/22	Continue analyzing documents for upcoming depositions.	3.00	1,095.00

Invoice Number: 11327736
August 19, 2022

Name	Date	Services	Hours	Amount
Rubinstein, J.	7/26/22	Analysis re policy stipulations (0.3); communicate with team re potential experts (0.4); revise potential expert retention agreement (0.4); confer with S. Sraders re expert and offensive deposition projects (0.3); revise draft scheduling order (0.4).	1.80	1,530.00
Sanchez, J.	7/26/22	Review documents in preparation for defensive depositions.	1.80	855.00
Martinez, S.	7/26/22	Review and revise correspondence tracking chart.	.70	227.50
Gaske, A.	7/26/22	Review draft policy stipulation for Aspen and NA Elite.	.50	305.00
Sraders, S.	7/26/22	Confer with J. Rubinstein re experts and depositions.	.30	198.00
Sraders, S.	7/26/22	Draft memorandum re Issue #34.	4.40	2,904.00
Sraders, S.	7/26/22	Confer with R. Shore re Issue #27 research.	.40	264.00
Sraders, S.	7/26/22	Analyze potential experts.	1.10	726.00
Turner, C.	7/26/22	Research contact information for various potential experts.	1.20	240.00
Huddleston, D.	7/26/22	Continue reviewing documents for defensive depositions.	4.00	1,680.00
Agwu, I.	7/26/22	Review documents in preparation for upcoming deposition.	6.00	2,520.00
Poz, N.	7/26/22	Research expert contact information.	.80	260.00
Poz, N.	7/26/22	Draft policy stipulation for Aspen American Insurance Company.	.60	195.00
Poz, N.	7/26/22	Draft policy stipulation for North American Elite Insurance Company.	1.10	357.50
Shore, R.	7/27/22	Confer with co-counsel re litigation issues (1.1); review memorandum re Issue #34, related cases and alternative approaches on this issue (1.7); communicate with S. Sraders re same (0.3); analysis re Issue #27 (0.6); review scheduling order and provide comments re same (0.3).	4.00	5,800.00
Girgenti, J.	7/27/22	Continue reviewing documents for upcoming depositions.	3.00	1,095.00

Invoice Number: 11327736
August 19, 2022

Name	Date	Services	Hours	Amount
Rubinstein, J.	7/27/22	Review co-plaintiffs' comments to draft expert retention letter, draft scheduling order, and draft deposition protocol in preparation for co-plaintiffs' call re same (1.0); review co-plaintiffs' communications re draft policy stipulations (0.2); review correspondence with insurer counsel re deposition scheduling (0.2); confer with document review team re preparation for Marsh depositions (0.9); confer with co-plaintiffs' counsel re expert retentions, deposition protocol, draft scheduling order, and additional litigation topics (1.1).	3.40	2,890.00
Sanchez, J.	7/27/22	Review documents in preparation for defensive deposition.	1.20	570.00
Rush, M.	7/27/22	Communicate with L. Szymanski and J. Rubinstein re review of Marsh documents.	.10	70.00
Rush, M.	7/27/22	Communicate with counsel for Liberty, Gulf, and Navigators re depositions of insurer witnesses.	.10	70.00
Rush, M.	7/27/22	Confer with team re review of Marsh documents in preparation for depositions.	.90	630.00
Rush, M.	7/27/22	Confer with co-counsel re case strategy, discovery, and schedule.	1.10	770.00
Gaske, A.	7/27/22	Confer with S. Sraders re deposition preparation.	.50	305.00
Gaske, A.	7/27/22	Communicate with defendant insurers re depositions.	.20	122.00
Gaske, A.	7/27/22	Review documents re Rule 30(b)(1) deposition preparation for Insurer #33.	1.40	854.00
Gaske, A.	7/27/22	Review exhibits accompanying draft policy stipulations for Aspen and NA Elite.	2.20	1,342.00
Leveridge, R.	7/27/22	Review comments from co-counsel re retainer letter for consulting expert (0.7); review comments on deposition protocol and proposed case management order (0.6); confer with co-counsel re same (1.1).	2.40	3,480.00
Sraders, S.	7/27/22	Confer with A. Gaske re preparation for upcoming depositions.	.50	330.00
Sraders, S.	7/27/22	Communicate with N. Poz re expert contact information.	.10	66.00
Sraders, S.	7/27/22	Analyze documents in preparation for upcoming deposition of L. Pinho.	2.10	1,386.00
Sraders, S.	7/27/22	Correspond with counsel for National Union and Zurich re depositions.	.10	66.00
Sraders, S.	7/27/22	Communicate with potential experts re case.	.10	66.00
Agwu, I.	7/27/22	Review documents in preparation for upcoming deposition.	6.00	2,520.00

Invoice Number: 11327736
August 19, 2022

Name	Date	Services	Hours	Amount
Poz, N.	7/27/22	Communicate with expert re potential retention.	.30	97.50
Poz, N.	7/27/22	Organize exhibits in support of stipulations for Aspen American Insurance Company and North American Elite Insurance Company.	1.90	617.50
Shore, R.	7/28/22	Review and analyze materials re Issue #27 (0.8); confer with R. Leveridge and J. Rubinstein re same (1.3); review memorandum re Issue #34 (0.8); confer with S. Sraders re same (0.9); confer with team re case status and strategy (0.5).	4.30	6,235.00
Girgenti, J.	7/28/22	Confer with team re case update.	.50	182.50
Girgenti, J.	7/28/22	Continue reviewing documents for upcoming depositions.	1.00	365.00
Rubinstein, J.	7/28/22	Confer with R. Shore and R. Leveridge re litigation strategy (1.3); revise correspondence to insurer counsel re draft policy stipulation (0.2); update task list (0.7); confer with team re litigation status and strategy (0.5); review analysis re offensive depositions (0.6); revise draft expert retainer letter (0.3).	3.60	3,060.00
Sanchez, J.	7/28/22	Confer with team re status and next steps in case.	.50	237.50
Rush, M.	7/28/22	Confer with A. Gaske and S. Sraders re affirmative deposition strategy and outlines.	.50	350.00
Rush, M.	7/28/22	Confer with team re case status and strategy.	.50	350.00
Rush, M.	7/28/22	Communicate with A. Farra re strategy.	.10	70.00
Rush, M.	7/28/22	Communicate with A. Bonesteel re Debtors' and third-party document productions.	.10	70.00
Rush, M.	7/28/22	Communicate with L. Szymanski re historic depositions.	.10	70.00
Martinez, S.	7/28/22	Confer with team re case status and strategy.	.50	162.50
Bonesteel, A.	7/28/22	Upload O'Connor deposition transcript to Relativity for attorney analysis.	1.40	525.00
Bonesteel, A.	7/28/22	Download Debtors' witness documentation.	.40	150.00
Gaske, A.	7/28/22	Confer with M. Rush and S. Sraders re deposition preparation status and next steps.	.50	305.00
Gaske, A.	7/28/22	Confer with team re litigation strategy and next steps.	.50	305.00
Gaske, A.	7/28/22	Review policy stipulation exhibits (1.1); communicate with certain insurers re draft policy stipulations (0.4).	1.50	915.00
Gaske, A.	7/28/22	Analyze tracking of Rule 30(b)(1) witnesses re scheduling depositions.	.30	183.00
Gaske, A.	7/28/22	Review document productions from Insurers #9 and #23 re deposition preparation.	1.30	793.00

Invoice Number: 11327736
August 19, 2022

Name	Date	Services	Hours	Amount
Leveridge, R.	7/28/22	Confer with R. Shore and J. Rubinstein re litigation strategy.	1.30	1,885.00
Leveridge, R.	7/28/22	Confer with team re litigation status and strategy.	.50	725.00
Leveridge, R.	7/28/22	Revise retention letter with potential consultant per comments from co-counsel (1.0); communicate with co-counsel re same (0.4).	1.40	2,030.00
Farra, A.	7/28/22	Confer with team re litigation status and strategy.	.50	355.00
Sraders, S.	7/28/22	Confer with A. Gaske and M. Rush re strategy for upcoming depositions.	.50	330.00
Sraders, S.	7/28/22	Confer with team re recent developments and strategy for next steps.	.50	330.00
Sraders, S.	7/28/22	Confer with R. Shore re Issue #34 strategy.	.90	594.00
Sraders, S.	7/28/22	Research re Issue #34.	.50	330.00
Kaminsky, E.	7/28/22	Confer with team re case status and strategy.	.50	280.00
Turner, C.	7/28/22	Calendar upcoming Rule 30(b)(6) deposition.	.30	60.00
Turner, C.	7/28/22	Confer with team re strategy and case updates.	.50	100.00
Huddleston, D.	7/28/22	Continue reviewing documents for defensive depositions.	6.80	2,856.00
Huddleston, D.	7/28/22	Communicate with M. Rush and J. Sanchez re status of document review.	.20	84.00
Huddleston, D.	7/28/22	Confer with team re case status and strategy.	.50	210.00
Agwu, I.	7/28/22	Review documents in preparation for upcoming deposition.	6.50	2,730.00
Agwu, I.	7/28/22	Confer with team re litigation status.	.50	210.00
Poz, N.	7/28/22	Confer with team re case status and next steps.	.50	162.50
Poz, N.	7/28/22	Draft witness tracker spreadsheet.	.30	97.50
Shore, R.	7/29/22	Confer with R. Leveridge, J. Rubinstein, S. Sraders and B. Hubbard re Issue #27 (0.8); analysis re various litigation issues (0.4); analysis of expert issues (0.4); confer with J. Rubinstein re strategy (0.3); analysis re Issue #34 (0.3); review cases re same (0.6).	2.80	4,060.00
Girgenti, J.	7/29/22	Review documents for upcoming depositions.	1.50	547.50
Rubinstein, J.	7/29/22	Review revised draft pretrial scheduling order (0.4); communicate with co-counsel re same (0.2); review updated draft deposition protocol (0.2); confer with R. Shore, R. Leveridge, S. Sraders, and B. Hubbard re Issue #27 (0.8); revise proposed agenda for co-plaintiff strategy discussion (0.3); revise letter to Gulf counsel re topic 15 of Rule 30(b)(6) notice (0.5); communicate with team re potential experts (0.2); review revised deposition protocol (1.5); confer with R. Shore re strategy (0.3).	4.40	3,740.00

Invoice Number: 11327736
August 19, 2022

Name	Date	Services	Hours	Amount
Gaske, A.	7/29/22	Revise policy stipulation and send to National Union.	.60	366.00
Gaske, A.	7/29/22	Review document production re preparation for Rule 30(b)(1) depositions.	1.70	1,037.00
Leveridge, R.	7/29/22	Draft agenda for meeting with co-counsel (0.7); review materials re same (0.7).	1.40	2,030.00
Leveridge, R.	7/29/22	Confer with R. Shore, J. Rubinstein, S. Sraders and B. Hubbard re Issue #27.	.80	1,160.00
Sraders, S.	7/29/22	Review certain insurance policies re Issue #27.	.70	462.00
Sraders, S.	7/29/22	Analyze background of potential expert.	.40	264.00
Sraders, S.	7/29/22	Confer with R. Shore, R. Leveridge, J. Rubinstein, and B. Hubbard re Issue #27.	.80	528.00
Turner, C.	7/29/22	Review and organize discovery pleadings.	.50	100.00
Turner, C.	7/29/22	Review and organize certain insurance policies.	.40	80.00
Hubbard, B.	7/29/22	Confer with R. Shore, R. Leveridge, J. Rubinstein, and S. Sraders re Issue #27.	.80	340.00
Huddleston, D.	7/29/22	Continue review of documents for defensive discovery.	3.90	1,638.00
Agwu, I.	7/29/22	Review documents in preparation for upcoming deposition.	4.00	1,680.00
Poz, N.	7/29/22	Update witness tracker spreadsheet.	1.80	585.00
Poz, N.	7/29/22	Draft policy stipulation for National Union.	.20	65.00
Shore, R.	7/31/22	Analysis re data sources.	1.00	1,450.00
Huddleston, D.	7/31/22	Continue reviewing documents for defensive depositions.	3.50	1,470.00
		Project Total:	697.40	\$ 486,069.50
TOTAL CHARGEABLE HOURS			741.10	
TOTAL FEES				\$ 513,743.50

Invoice Number: 11327736
August 19, 2022

TIMEKEEPER SUMMARY

Timekeeper	Hours	Rate	Total
Gilbert, S.	5.50	1,800.00	9,900.00
Quinn, K.	2.60	1,250.00	3,250.00
Shore, R.	65.00	1,450.00	94,250.00
Girgenti, J.	109.10	365.00	39,821.50
Rubinstein, J.	22.80	425.00	9,690.00
Rubinstein, J.	119.10	850.00	101,235.00
Sanchez, J.	42.60	475.00	20,235.00
Rush, M.	35.20	700.00	24,640.00
Martinez, S.	6.80	325.00	2,210.00
Bonesteel, A.	6.90	375.00	2,587.50
Gaske, A.	40.20	610.00	24,522.00
Leveridge, R.	47.50	1,450.00	68,875.00
Farra, A.	4.40	710.00	3,124.00
Sraders, S.	9.80	330.00	3,234.00
Sraders, S.	66.10	660.00	43,626.00
Kaminsky, E.	5.60	560.00	3,136.00
Turner, C.	13.30	200.00	2,660.00
Hubbard, B.	11.10	425.00	4,717.50
Huddleston, D.	43.50	420.00	18,270.00
Agwu, I.	68.00	420.00	28,560.00
Poz, N.	16.00	325.00	5,200.00
TOTALS	741.10		\$ 513,743.50

TASK SUMMARY

Task	Description	Hours	Amount
A004	Case Administration	2.20	440.00
A009	Meetings / Communications with AHC & Creditors	5.60	9,360.00
A015	Non-Working Travel (Billed @ 50%)	32.60	12,924.00
A019	Plan of Reorganization / Disclosure Statement	3.30	4,950.00
A020	Insurance Adversary Proceeding	697.40	486,069.50

Invoice Number: 11327736
August 19, 2022

EXPENSE DETAILS

E110: Out-of-Town Travel

Date	Description	Task	Amount
7/12/22	Travel - Mileage / Jason Rubinstein / Stamford CT / Attend Deposition Prep / 07.12-14.2022 (648 miles @ \$0.625/mile)	E110	405.00
7/12/22	Travel - Tolls / Jason Rubinstein / Stamford CT / Attend Deposition Prep / 07.12-14.2022	E110	48.90
7/12/22	Travel - Parking / Jason Rubinstein / Stamford CT / Attend Deposition Prep / 07.12-14.2022	E110	31.90
7/12/22	Travel - Lodging / Jason Rubinstein / Stamford CT / Attend Deposition Prep / 07.12-14.2022 (2 nights)	E110	708.40
7/12/22	Travel - Meals / Jason Rubinstein / Stamford CT / Attend Deposition Prep / 07.12-14.2022	E110	82.62
7/17/22	Travel - Mileage / Jason Rubinstein / Stamford CT / Attend Debtors' Rule 30(b)(6) Preparation and Deposition / 07.17-20.2022 (637 miles @ \$0.625/mile)	E110	398.13
7/17/22	Travel - Tolls / Jason Rubinstein / Stamford CT / Attend Debtor 30(b)(6) Preparation and Deposition / 07.17-20.2022	E110	14.01
7/17/22	Travel - Lodging / Jason Rubinstein / Stamford CT / Attend Debtor 30(b)(6) Preparation and Deposition / 07.17-20.2022 (3 nights)	E110	917.46
7/17/22	Travel - Meals / Jason Rubinstein / Stamford CT / Attend Debtor 30(b)(6) Preparation and Deposition / 07.17-20.2022	E110	123.13
	Sub-Total of Expenses:		\$ 2,729.55
	TOTAL EXPENSES		\$ 2,729.55
	TOTAL FEES AND EXPENSES		\$ 516,473.05